

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

Mark Henkel

22 CR 58
Judge Elaine E. Bucklo

DEFENDANT MARK HENKEL'S MOTION TO CONTINUE THE TRIAL
(UNOPPOSED)

By his attorney Bedi & Singer, LLP, Mark Henkel respectfully requests this Court to continue the final pretrial conference and trial date. In support, Mr. Henkel states as follows:

1. The defendants are charged with various counts of wire fraud. There is a trial set for January 6, 2025.
2. The undersigned counsel has recently been appointed to represent Mr. Mark Henkel. Mr. Clancy has recently been appointed to represent Donald Henkel.
3. The discovery in this matter is voluminous and will take some time to review and prepare for trial.
4. The undersigned had conferred with counsel for co-defendant's Donald Henkel and Raymound Paperella, who do not object to this request. Further, the undersigned has conferred with the government who does not object.
5. The ends of justice served by granting this request for a continuance outweigh the best interest of the public and the defendant in a speedy trial. Mr. Henkel has been advised and agrees that the delay in proceeding to trial, occasioned by a continuance granted in response to this request, will be excluded for purposes of calculating a trial setting under the Speedy Trial Act (18 U.S.C. § 3161(h)(7)(A))

and (B)) and the U.S. Constitution.

WHEREFORE, the undersigned counsel is respectfully asking this Court to continue the date of filing of the response to Dkt. 60 to February 10, 2023.

Respectfully submitted,

By: s/ Jonathan S. Bedi

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Jonathan S. Bedi, Attorney at Law, hereby certifies that the foregoing document for was served in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/ Jonathan S. Bedi
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